

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FORT LAUDERDALE DIVISION

CASE NO. 0:24-cv-60050

AT LAW AND IN ADMIRALTY

JANE DOE,
Individually and as the Parent and Natural
Guardian of A.K., a Minor Child,

Plaintiff,

v.

MSC CRUISES, S.A.,
MSC CRUISE MANAGEMENT (UK) LIMITED,

Defendants.

_____ /

**PLAINTIFF'S UNOPPOSED MOTION FOR
APPROVING SETTLEMENT OF THE MINOR'S CLAIMS**

The Plaintiff, JANE DOE, Individually and as the Parent and Natural Guardian of A.K., a Minor Child, by and through her undersigned counsel hereby respectfully moves that the Court approve the settlement of the minor's claims, and says:

1. **Background and Introduction.** The Parties have resolved this case. Jane Doe brought this lawsuit as the parent and natural guardian of A.K. (6 years old at the time of the incident¹). The Plaintiff files this Motion seeking the Court's approval of the settlement in this case.

2. **Court Approval.** When parties reach a settlement after the start of litigation in a case involving a minor, the court with jurisdiction over the action must approve the settlement. Fla. Stat. Ann. § 744.387(3)(a). As of the date of this filing, A.K. is still a minor child. As such, it is

¹ The incident occurred on January 29, 2023.

necessary that the Court approve the settlement of A.K.'s claims.

3. **Confidential Settlement.** The Parties have agreed that the terms of the settlement are confidential. Counsel for Plaintiff can provide the Court with the settlement documents either in camera or under seal if the Court wishes to review such documents.

4. **No need to appoint a guardian ad litem.** The gross settlement in this case does not exceed the statutory amount identified in Fla. Stat. 744.3025(1)(b) (if the settlement exceeds \$50,000, "the court shall appoint a guardian ad litem to represent the minor's interest before approving a settlement of the minor's claims."). As such, a guardian at litem does not need to be appointed in this case.

5. **The net settlement.** The net settlement proceeds of the settlement will go to A.K. and shall be placed into an account which is being set up for A.K. Jane Doe has retained Forge Consulting LLC, which is a full-service financial firm dedicated to helping families create financial plans specific to their needs, to set up the account and investment strategy for the benefit of A.K.

Forge Consulting LLC
3350 Riverwood Parkway
Suite GL-28
Atlanta, GA 30339

6. **Conferral.** MSC does not object to the relief sought herein.

WHEREFORE, Plaintiff requests that the Court approve the settlement of the minor's claims, and for such further and other relief as the court deems just and appropriate.

CERTIFICATE OF COUNSEL

Pursuant to the Local Rule of the Southern District of Florida, the undersigned hereby certifies that she has conferred with Defense counsel regarding the issues in this motion. Counsel for Defendants agrees.

Respectfully submitted,

s/ Lisa C. Goodman

LISA C. GOODMAN, ESQ. (FBN 118698)

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of the Court via CM/ECF on this 21st day of March 2025. We also certify that the foregoing was served on all counsel or parties of record on the attached Service List either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Filing.

By: s/ Lisa C. Goodman
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SERVICE LIST

JANE DOE, Individually and as the Parent and Natural Guardian of A.K., a Minor Child
v. MSC CRUISES, S.A. and MSC CRUISE MANAGEMENT (UK) LIMITED

CASE NO. 0:24-cv-60050

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